

AIELLO CANNICK
Your rights • Our business

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MEMO ENDORSED

January 11, 2022

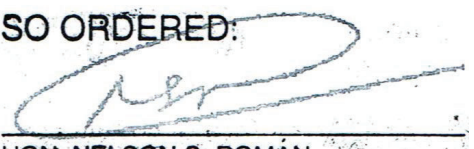
VIA ECF

Honorable Nelson S. Roman
United States District Court
Southern District of New York
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Deft's request for a temporary bail modification for the below-stated specified dates is GRANTED without objection by the Pretrial Services Officer. The Gov't does not take a position. Deft. shall provide Pretrial Services with specific travel information. Clerk of Court requested to terminate the motion (doc. 59).
Dated: Jan. 13, 2022

Re: United States v. Alicia Ayers
Case No.: 21-CR-00440 -01

SO ORDERED:


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Dear Judge Roman:

We write to request a bail enlargement for Ms. Alicia Ayers. She requests permission to travel to the following locations in order to secure business for her travel agency business.

1. Baltimore, Maryland on January 15th, 2022. She will be departing at 7:00 a.m. and returning at 7:00 p.m. She will be meeting with Timothy Anderson at 2512 Jefferson Street, Baltimore, MD, telephone 443-529-6780. This is a development property that will be listed as an Airbnb.
2. New York to New Orleans on January 18th returning on January 19th. She will be visiting an Airbnb located at 2706 Saint Claude Avenue, New Orleans and meeting with Lloyd Dillon, telephone 504-251-9555. This is a potential site for new clients.
3. Newark to Fort Myers on January 20th returning January 23. Newark at 10:50 a.m. returning at 8:00 p.m. back to Newark. Hotel – Town Place Suites – 23161 Coconut Point, Fort Myers. She will be meeting with Dean Harris, telephone 239-565-5252. This is also a development project that will be listed as an Airbnb.

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At the request of ADA Heavey, we inform the Court that Ms. Ayers has made a total of three trips for her travel business to date. Ms. Ayers has traveled to the following locations thus far:

1. Hawaii – September 26, 2021
2. New Orleans – October 30, 2021
3. Baltimore – November 18, 2021
4. Pennsylvania – December 10, 2021 - cancelled

Please know that AUSA Courtney Heavey takes no position and Probation Officer Killian does not object to our request.

Thank you in advance for your consideration in this matter.

Respectfully submitted,

/s/ Deveraux L. Cannick

Deveraux L. Cannick

DLC/mw

cc: AUSA Courtney Heavey
AUSA Jeffrey Coffman
Probation Officer Jessica Killian